

Message

From: Talbot, Tracey [Tracey.Talbot@Infineum.com]
Sent: 5/5/2021 2:34:50 PM
To: Bauer, Jeff [Bauer.Jeff@epa.gov]
Subject: RE: SN 21-0002 request for conference call

Hi – ill send you the meeting link

Best regards

Tracey

This note and any attachments may contain Infineum confidential or proprietary information. If you are an unintended recipient: (i) place no reliance on the information contained herein; (ii) do not disclose, distribute or duplicate any information from this note; and (iii) please contact the sender

From: Bauer, Jeff <Bauer.Jeff@epa.gov>
Sent: 05 May 2021 15:34
To: Avcin, Joseph <Avcin.Joe@epa.gov>; Bower, David <David.Bower@Infineum.com>
Cc: Talbot, Tracey <Tracey.Talbot@Infineum.com>
Subject: RE: SN 21-0002 request for conference call

Is David setting up the meeting or are we?

Jeff Bauer - Program Manager
United States Environmental Protection Agency (USEPA)
Office of Pollution Prevention and Toxics (OPPT)
New Chemicals Program (7405M)
<http://www.epa.gov/oppt/newchems/>

EPA East Building, room 4133M
1201 Constitution Ave., NW
Washington, DC 20004
Phone: 202-564-9042, Fax: 202-564-9490

From: Avcin, Joseph <Avcin.Joe@epa.gov>
Sent: Wednesday, May 05, 2021 9:59 AM
To: Bower, David <David.Bower@Infineum.com>; Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Talbot, Tracey <Tracey.Talbot@Infineum.com>
Subject: RE: SN 21-0002 request for conference call

Let's go w/ Teams.

Thanks,
Joe Avcin

U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics
1200 Pennsylvania Ave NW (7403M)
Washington, DC 20460
202-564-1811
Cubicle 6334S

From: Bower, David <David.Bower@Infineum.com>
Sent: Wednesday, May 05, 2021 9:56 AM
To: Avcin, Joseph <Avcin.Joe@epa.gov>; Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Talbot, Tracey <Tracey.Talbot@Infineum.com>
Subject: RE: SN 21-0002 request for conference call

Good morning, Joe.

10.30 works for us. I'll send you an invitation; please let me know if you prefer Teams or Skype.

Thanks,
David

This note and any attachments may contain Infineum confidential information. If you are an unintended recipient: (i) place no reliance on the information contained herein; (ii) do not disclose, distribute, or duplicate any information from this note; and (iii) please contact the sender.

From: Avcin, Joseph <Avcin.Joe@epa.gov>
Sent: Wednesday, May 5, 2021 09:50
To: Bower, David <David.Bower@Infineum.com>; Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Talbot, Tracey <Tracey.Talbot@Infineum.com>
Subject: RE: SN 21-0002 request for conference call

David,

May I call you at 10:30 AM EST today?

Thanks,
Joe Avcin
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics
1200 Pennsylvania Ave NW (7403M)
Washington, DC 20460
202-564-1811
Cubicle 6334S

From: Bower, David <David.Bower@Infineum.com>
Sent: Tuesday, May 04, 2021 5:20 PM
To: Avcin, Joseph <Avcin.Joe@epa.gov>; Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Talbot, Tracey <Tracey.Talbot@Infineum.com>
Subject: SN 21-0002 request for conference call

Dear Mr. Avcin,

Infineum USA filed SNUN SN-21-0002 on 27 January. The review period has lapsed, and the case manager (Jeff Bauer) has indicated that further information would be required to address the Agency's concerns over release to water. It appears from below that the concern rests with cleaning the bulk liquid containers (BLCs) in which the product is shipped from Europe to the US; however, we would like you to clarify that this is the case and, if so, what information you would need to address this concern.

We'd like to discuss this with you this week. We appreciate that this is short notice, but Infineum is currently in the midst of a severe supply interruption and we were hoping for resolution before the review period ended. Please let us know when you would be available for 30 minutes or so.

Thank you in advance for your help. Please contact me if you have any questions or need more information.

Sincerely,
David Bower

David B. Bower, Ph.D.
Product Stewardship Advisor, Americas
Product Stewardship Support Leader

Infineum USA, L.P.
1900 East Linden Avenue
Linden, NJ 07036 USA

Phone +1 908.474.2634
Mobile +1 732.535.2904
Fax +1 908.474.3838

e-mail david.bower@infineum.com

This note and any attachments may contain Infineum confidential information. If you are an unintended recipient: (i) place no reliance on the information contained herein; (ii) do not disclose, distribute, or duplicate any information from this note; and (iii) please contact the sender.

From: Bauer, Jeff <Bauer.Jeff@epa.gov>
Sent: Friday, April 23, 2021 12:28
To: Talbot, Tracey <Tracey.Talbot@infineum.com>
Cc: Bower, David <David.Bower@infineum.com>; Bauer, Jeff <Bauer.Jeff@epa.gov>
Subject: RE: SN 21-0002 status update

Tracey,

The information provided on the 7th was sent to the engineer to see if would change any of the water releases. The information on the "containers" may not be strong enough to change that release. It was to be specific to the one site for this PMN but it appears to be a company policy explanation on bulk cleaning. I am still waiting on the updated engineering report.

We will have to suspend the case as it may look like we will need to do a Consent Order with a Water trigger to protect against gen pop risk for the reproductive toxicity and add the new use, the other requirements that are in the existing SNUR will also convey into this Order as well. I am working on getting the DWEL from RAB to see what that would be. I wanted to get the other reports updated so when the HH report is completed it would have that information in it as well. The Human Health reports are taking a long time to get thru the QA/QC process.

Thanks
Jeff

Jeff Bauer - Program Manager
United States Environmental Protection Agency (USEPA)
Office of Pollution Prevention and Toxics (OPPT)
New Chemicals Program (7405M)
<http://www.epa.gov/oppt/newchemicals/>

EPA East Building, room 4133M
1201 Constitution Ave., NW
Washington, DC 20004
Phone: 202-564-9042, Fax: 202-564-9490

From: Talbot, Tracey <Tracey.Talbot@Infineum.com>
Sent: Friday, April 23, 2021 11:31 AM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Bower, David <David.Bower@Infineum.com>
Subject: RE: SN 21-0002 status update

Hi Jeff

I hope you are keeping well and had a good Easter break. Dave sent through the mitigating data 8th April which we trust provided the mitigation needed. Can you let me or Dave know are we all on track to have the SNUN dropped next week with no issue?

We think day 90 is Tuesday 27 April and it would be nice to give some good news to our colleagues in Europe still addressing the supply issues there.

Finally as always please let Dave or myself know if you need further assistance or clarification. Look forward to hearing from you soon!

Best regards

Tracey

This note and any attachments may contain Infineum confidential or proprietary information. If you are an unintended recipient: (i) place no reliance on the information contained herein; (ii) do not disclose, distribute or duplicate any information from this note; and (iii) please contact the sender

From: Bauer, Jeff <Bauer.Jeff@epa.gov>
Sent: 24 March 2021 16:32
To: Talbot, Tracey <Tracey.Talbot@Infineum.com>
Cc: Bower, David <David.Bower@Infineum.com>; Bauer, Jeff <Bauer.Jeff@epa.gov>
Subject: RE: SN 21-0002 status update

Tracey,

I am sanitizing the engineering report and exposure report to send to David. I am going to ask him to address the water releases to help mitigate potential general population risk. The final human health report is being QA/QC'd and the draft that I reviewed has identified that risk

Thanks
Jeff.

Jeff Bauer - Program Manager
United States Environmental Protection Agency (USEPA)
Office of Pollution Prevention and Toxics (OPPT)
New Chemicals Program (7405M)
<http://www.epa.gov/oppt/newchemicals/>

EPA East Building, room 4133M
1201 Constitution Ave., NW
Washington, DC 20004
Phone: 202-564-9042, Fax: 202-564-9490

From: Talbot, Tracey <Tracey.Talbot@Infineum.com>
Sent: Monday, March 22, 2021 12:23 PM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Bower, David <David.Bower@Infineum.com>
Subject: SN 21-0002 status update

Hi Jeff

I am the Primary support for SN-21-002. I have called today and left a voicemail asking if you can update me or the Authorised Official (David Bower copied in this note) on progress of the SNUN. We can see it went through the Scoping meeting last month but there is no final disposition yet.

Normally I would be more patient but our company has a significant supply issue in Europe so the sooner we can import the SNUN substance into the USA to make a new product for export the better. I know this is not your problem and the review period has a set time but if you could help me out and provide a steer to the likely outcome and/or whether it will be dropped after the 90 days that will be very helpful. I and/or David look forward to hearing from you soon!

Best Regards

Tracey

Tracey Talbot
Regulatory Projects Advisor
Infineum UK Ltd
PO Box 1
Milton Hill
ABINGDON
Oxon OX13 6BB

Tel: +44 (0) 1235 469345
Fax: +44 (0) 1235 549864

Registered in England Number 3137282 Registered address: PO Box 1, Milton Hill, Abingdon OX13 6BB England

This note and any attachments may contain Infineum confidential or proprietary information. If you are an unintended recipient: (i) place no reliance on the information contained herein; (ii) do not disclose, distribute, or duplicate any information from this note; and (iii) please contact the sender